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28207 Bremen  
Germany

United States Bankruptcy Court  
824 Northmarket Street, 3rd Floor  
Wilmington, Delaware 19801

Date: 28. Dec. 2023

**Case Number 22-11068 (JTD)**

Re: Objection to Motion to Dismiss Bankruptcy Cases of FTX Trading LTD. and MACLAURIN Investments LTD.

Plaintiff: Daniel Egbuniwe

Defendant: FTX Trading Ltd., et al.

Objection to Motion to Dismiss Bankruptcy Case

CC per Email:

[Daniel.egbuniwe@gmail.com](mailto:Daniel.egbuniwe@gmail.com)

Pachulski Stang Ziehl & Jones LLP 919 North Market Street, 17th Floor Wilmington DE 19801

Attn: Laura Davis Jones [ljones@pszilaw.com](mailto:ljones@pszilaw.com) and Peter J. Keane [pkeane@pszilaw.com](mailto:pkeane@pszilaw.com)

The Daley Law Firm LLC, 4845 Pearl East Circle Suite 101, Boulder, CO 80301 Darrell Daley [darrell@daleylawyers.com](mailto:darrell@daleylawyers.com) and Samantha Neal [samantha@daleylawyers.com](mailto:samantha@daleylawyers.com)

Morrison Cohen LLP, 909 Third Avenue, 27th Floor New York, NY 10022

Attn: Joseph T. Moldovan [jmoldovan@morrisoncohen.com](mailto:jmoldovan@morrisoncohen.com) and Heath D. Rosenblat [hrosenblat@morrisoncohen.com](mailto:hrosenblat@morrisoncohen.com)

Dear Sir & Madame

This letter serves as formal notification of my objection to the Defendant's Motion to Dismiss the Bankruptcy Cases of FTX Trading Ltd and MACLAURIN Investments Ltd [Case Number 22-11068] (the "Motion"). The Motion is attached to this letter for your reference.

I am a creditor of the Defendant and have a valid claim against them for Cryptoassets with a purchase value of no less than 28 896,79€ (twenty eight thousand eight hundred and ninety six euros and seventy nine euro cents).

I respectfully submit that the Motion should be denied for the following reasons:

The Objector Has a Valid Claim: The Objector is a creditor of the Debtor and has a valid claim against the Debtor for 28 896,79€ (twenty eight thousand eight hundred and ninety six euros and seventy nine euro cents).

The Bankruptcy Process is the Proper Venue to Resolve the Objector's Claim: The Objector's claim can only be adequately resolved through the bankruptcy process. The bankruptcy court has the authority to determine the validity of the Objector's claim, to equitably distribute the Debtor's assets among its creditors, and to protect the Objector's rights.

The Motion to Dismiss is Premature: The Motion to Dismiss is premature because the bankruptcy court has not yet had an opportunity to consider the Objector's claim. The Objector is entitled to have its claim adjudicated in the bankruptcy court before the Debtor's bankruptcy case is dismissed.

I respectfully request that the Court deny the Defendant's Motion to Dismiss the Bankruptcy Case.

Thank you for your attention to this matter.

Yours sincerely



Daniel Egbuniwe

Attachments

Exhibit 1: Notice of Motions to Dismiss Bankruptcy Cases against A) FTX TRADING LTD. B) MACLAURIN INVESTMENTS LTD.



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SRF 75211

**Exhibit 1****IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,Debtors.<sup>1</sup>

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Objection Deadline: January 10, 2024 at 4:00 p.m. (ET)  
Hearing Date: January 25, 2024 at 10:00 a.m. (ET)**NOTICE OF MOTIONS TO DISMISS BANKRUPTCY CASES OF  
(A) FTX TRADING LTD. AND (B) MACLAURIN INVESTMENTS LTD.**

**PLEASE TAKE NOTICE** that on October 27, 2023, Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG (together, "**LI Parties**") filed their (a) *Motion of Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG to Dismiss Bankruptcy Case of MacLaurin Investments Ltd.* [D.I. 3399] and (b) *Motion of Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG to Dismiss Bankruptcy Case of FTX Trading Ltd.* [D.I. 3400] jointly, "**LI Parties' MSTD**").

**PLEASE TAKE FURTHER NOTICE THAT** objections (for parties other than the Debtors), if any, to the relief requested in the LI Parties' MSTD must be in writing and filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 ("**Court**"), on or before **January 10, 2024, at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the objection so as to be received no later than **4:00 p.m. (ET) on January 10, 2024**, on the following parties: (a) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attn: Laura Davis Jones (ljones@pszjlaw.com) and Peter J. Keane (pkeane@pszjlaw.com); (b) The Daley Law Firm, LLC, 4845 Pearl East Circle, Suite 101, Boulder, CO 80301 Darrell Daley (darrell@daleylawyers.com) and Samantha Neal (samantha@daleylawyers.com); and (c) Morrison Cohen LLP, 909 Third Avenue, 27th Floor, New York, NY 10022, Attn: Joseph T. Moldovan (jmoldovan@morrisoncohen.com) and Heath D. Rosenblat (hrosenblat@morrisoncohen.com).

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in the above-captioned jointly-administered chapter 11 cases, a complete list of the debtors (collectively, "**Debtors**") and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.



**PLEASE TAKE FURTHER NOTICE THAT** the hearing on the LI Parties' MSTD will be held on **January 25, 2024 at 10:00 a.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE THAT** copies of the LI Parties' MSTD may be obtained free of charge from Kroll ("**Claims and Noticing Agent**") through the case website at <https://restructuring.ra.kroll.com/FTX/Home-Index> (or viewed on the internet, for a fee, at the Court's website <http://www.deb.uscourts.gov> by following the directions for accessing the ECF system on such website). Parties-in-interest may also request copies of the LI Parties' MSTD from the LI Parties by emailing the undersigned counsel. Please note that the Claims and Noticing Agent is not permitted to give legal advice.

Dated: December 14, 2023  
Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)  
Peter J. Keane (DE Bar No. 5503)  
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- and -

MORRISON COHEN LLP  
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Heath D. Rosenblat (admitted *pro hac vice*)  
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